## Case 1:21-cr-99689-JGK Becument 52 Filed 96/92/22 Page 1 9f 1



Joseph DiBenedetto\*
\*Admitted in NY, NJ & DC

EDWARD S. PANZER MARIO J. DEROSSI OF COUNSEL

June 2, 2022

VIA ECF

The Honorable John G. Koeltl Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312 APPLICATION GRANTED

John G. Koelil, U.S.D.J.

Re:

United States v. Wael Hamad, et al.

21 CR 680 (JGK)

Dear Judge Koeltl:

Upon the recommendation of Pretrial Services, we write to respectfully request that this Court modify Hamad's conditions of release by removing the requirement of Stand Alone Monitoring.

Pretrial Services has conveyed to counsel that Hamad has been consistently compliant with his conditions of release since October 2021, and they do not believe that Stand Alone Monitoring is a necessary requirement to ensure his appearance in court and the safety of the community.

Pretrial Services also contacted the government to convey this opinion. Government counsel deferred to the judgment of Pretrial Services.

For these reasons, it is respectfully requested that this Court modify Hamad's conditions of release by removing the requirement of Stand Alone Monitoring.

Respectfully submitted,

/s/ Joseph DiBenedetto

cc:

Government Counsel

Pretrial Services (via email)